

# ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE ER REGULATORY CONTACT RECORD

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**Date/Time:** November 17, 2005 / 10:00 a.m.

**Site Contact(s):** K-H Jan Walstrom, Susan Serreze

**Phone:** 303-692-2035 – CDPHE  
303/312-6312 - EPA  
303/966-4226 – DOE

**Agency:** CDPHE: Harlen Ainscough, Dave Kruchek, Carl Spreng  
EPA: Sam Garcia, Larry Kimmel, Todd Bechtel  
DOE: Norma Castañeda

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**Purpose of Contact:** A meeting was held on November 17, 2005 to discuss the FY05 HRR.

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**Discussion:** See meeting minutes below.

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**Contact Record Prepared By:** Susan Serreze

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## November 17, 2005 Comment Resolution Meetings For FY2005 HRR

A meeting was held on November 17, 2005 to discuss the FY2005 HRR.

### Attendees

CDPHE: Harlen Ainscough, Dave Kruchek, Carl Spreng  
EPA: Sam Garcia, Larry Kimmel, Todd Bechtel (Greystone)  
K-H Team: Jan Walstrom, Susan Serreze

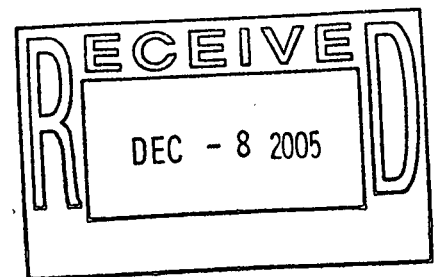
### II. Report Status

#### Issues

No Sitewide issues were discussed.

#### Specific Comments

#### FY2005 HRR



ADMIN RECORD

IA-A-002901

1/9

The attached written comments were received from EPA and CDPHE. The following resolutions were agreed to:

- Figures showing remaining pipes, manholes, grates, and other OPWL, NPWL, storm drain, and sanitary sewer information will be referenced to the appropriate figures in closeout reports.
- The three times the AL concept is explained in the introduction. Additional text will be added to the introduction.
- The OU 3 map will be reviewed and revised as necessary.
- All other comments will be addressed.

#### **Other Issues**

There were no other issues for discussion.

#### **V. Meetings**

There are no other meetings planned.

EPA Comments for the FY 2005 Final Historical Release Report  
**October 2005**

**November 17, 2005**

Specific Comments

**000 Area – 700 Area**

1. **IHSS Number 121, Original Process Waste Lines (OPWL).** OPWL, tanks, and sumps left in place should be shown in a figure.
2. **IHSS Number 162, Page 193.** Fill in the missing date for October \_\_\_, 2005,
3. **IHSS Number 168.** This IHSS is not shown on Figure 14.
4. **PAC Reference Number 000-500, Sanitary Sewer System.** Sewer lines, manholes, and lift stations left in place should be shown in a figure.
5. **PAC Reference Number 000-501.** This PAC is not shown on Figure 14.
6. **PAC Reference Number 000-504, New Process Waste Lines (NPWL).** NPWL and valve vaults left in place should be shown in a figure.
7. **PAC Reference Number 000-505, Storm Drains.** Storm drains and manholes left in place should be shown in a figure.
8. **100 Area, PAC 100-148, page 229, fourth bullet.** Typo: “Americium 1241 was detected”.
9. **100 Area, PAC 100-602, page 236, PAC Investigations, 2<sup>nd</sup> sentence.** Open parenthesis.
10. **100 Area, PAC 100-607, page 248, last paragraph on page.** Missing a period between two sentences.
11. **300 Area, PACs 300-134N and 300-134S, page 271, last sentence under IHSS Investigations:** Sentence states that “the maximum benzo(a)pyrene result was less than three times the WRW soil AL.” Please explain this three-times WRW AL threshold.
12. **300 Area, PAC 300-151, page 275, Historical Summary, 3<sup>rd</sup> paragraph.** “A second spill released 50 gallons... No environmental impact was expected from the 50-gallon spill cleanup is documented.” Please provide rationale for this statement.
13. **400 Area, PAC 400-129, page 340, last sentence of NFAA Recommendation section.** Typo: “CDPHE”.
14. **700 Area, PAC 700-123.1, page 507, IHSS Investigations.** This paragraph refers to “PRGs”. Please define, or is this supposed to PPRGs?

15. **700 Area, PAC 700-150.1, page 566, Historical Summary, first bullet.** Typo:  
“(HEPA0 filters” should be “(HEPA) filters.”
16. **700 Area, PAC 700-1110, page 632, last paragraph of Historical Summary.**  
This paragraph refers to a “pit east of the SEP” where drums and cylinders were destructively ventilated with explosives. Please refer to the IHSS or other investigative unit that covers this pit, or state why there is none

#### **PICs**

1. **PIC Reference Number 37, Historical Summary.** The fourth sentence states “. . . 40 gallons of soil was removed.” Please use the appropriate units, instead of gallons, for soil.

**CDPHE Comments**  
**000 Area HRR**

Have the following comments:

1) HRR 121 & Closeout Report for 000-2 - Please correctly address the final condition and actions associated with Tanks 36 and 37. In Table 2 on page 15 it states that these tanks were removed in 2004. However, in the HRR and in Section 4.2.7 page 159 it states that both were decontaminated, left in place and backfilled. Please provide a consistent position as to the final disposition of these two tanks. It is our understanding that at a minimum the steel tank inserts were removed during the decontamination phase, but this needs to be properly investigated and discussed.

2) HRR 121 & Closeout Report for 000-2 - Also, although the HRR states that all tanks have been removed, 36 and 37 are identified as remaining, as well as remaining tanks 19 & 20 (Table 2 page 15 in the Closeout

Report) in B779 that were part of the sub-basement and filled with flowfill. These are shown on Fig 16 referenced in the HRR.

3) HRR 162 - Please change the following: "There are five OPWL lines that run within IHSS 162, including P-6, P-9, P-11, P-12 and P-13 (DOE 2005a). There are two known leaks that have occurred along these lines (one along P-6 and P-9 and one along P-12 and P-13.) All five lines were removed during the IHSS Group 000-2 accelerated actions.", to properly identify that the five lines mentioned have not been removed, and that this can not be included as rationale for remediation or NFAA. However, to indicate that this area has been disturbed it could be mentioned that most of the NPWLs in this area were removed.

4) HRR -168 - It states "Based on information presented in the Final OU 11 Combined Phases RFI/RI Report (DOE 1995a), a CAD/ROD recommending No Action under CERCLA and Clean Closure under RCRA was prepared (DOE 1995b). The CAD/ROD, and IHSS 168s No Action status, was approved on September 21, 1995 (DOE et al. 1995)." So what is the RCRA status of this site? Please change this or add discussion to complete the RCRA status.

5) HRR 505, Table 3 - Please complete all IHSS descriptions.

**Draft**  
**PAC 000s**  
**Comprehensive**  
**Historical Release Report**  
**2005**

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**Specific Comments:**

**PAC REFERENCE NUMBER: 000-101:**

1. IHSS Investigations: Please verify the regulatory status described in the last sentence of the first paragraph of the section. Although considered NPWL, the above ground line described was not included in the RCRA unit. The apparent rationale, DOE position, was that the leachate from the Solar Ponds was not from a landfill and therefore not F039 listed waste subject to RCRA. Address accordingly.
2. Note and address as necessary the reference to unit 374.3 in the third and fifth paragraphs of the section, see above.
3. The discussions in the sixth, seventh and eighth paragraphs is convoluted. It is not clear how nine hot spots resulted in six soil removals with all confirmation samples below WRW, yet one subsurface arsenic value exceeding WRW. Please reorganize and simplify the discussion.

**PAC REFERENCE NUMBER: 000-504:**

4. Historical Summary: In the last paragraph of the section, state that NPWL closure began under the 1997 permit but was finalized under the 2004 permit. Please update the reference section accordingly.
5. No Further Action Recommendation: In the last paragraph, page 40 (218 of the full draft document), it would be appropriate to acknowledge the October 4, 2005 CDPHE acceptance of the RCRA Unit 374.3 (400 and 700-800 Area) Closure Summary Reports, which were inclusive of the entire RCRA unit.

**Colorado Department of Public Health and Environment**

**Hazardous Materials & Waste Management Division**

**Comments**

**Draft**

**PAC 700s**

**Comprehensive**

**Historical Release Report**

**2005**

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**Specific Comments:**

**PAC REFERENCE NUMBER: 700-123:**

- 1. Historical Summary:** Please verify that the RCRA closure document referred to actually contain a discussion of Valve Vault 7.

**PAC REFERENCE NUMBER: 700-131:**

- 2. IHSS Investigation:** Relative to chromium in the fourth bullet, please discuss the additional boring to the target interval, which indicated the contamination to be localized.

**PAC REFERENCE NUMBER: 700-150.1:**

- 3. IHSS Investigation:** Please specify the depth of the two arsenic exceedances in the bullets (page 568 of the hard copy). The discussion following the bullets indicates WRW exceedances in two surface samples, which given the lack of depths for the bulleted exceedances, suggests that these are the same samples. Please clarify the entire discussion.

**PAC REFERENCE NUMBER: 700-150.7:**

**No Further Action Recommendation:** Please qualify/modify the phrase "not erodible" in this section. Please conduct a global search of all P

**CDPHE Comments**  
**UBC Sites**

The following comments apparently were not addressed:

PAC REFERENCE NUMBER: UBC-439:

1. PAC Investigations: Please qualify the statement concerning subsurface sampling. The entire "B" interval was not sampled, but sampling of the upper portion was deemed sufficient after analytical results were reported.

PAC REFERENCE NUMBER: UBC-441:

1. PAC Investigations: Since drain lines were covered under accelerated action, rather than building D&D, please acknowledge the occurrence and recovery of elemental mercury found in the line(s).

PAC REFERENCE NUMBER: UBC-442:

1. PAC Investigations: Please clarify the approximate distance into the ends of waste lines grout was placed. Clarification is needed in the fourth paragraph of the section.

PAC REFERENCE NUMBER: UBC-444:

1. No Further Action Recommendation: Please clarify that the lead occurrence was not actionable under the Elevated Measurement Comparison protocol of the IABZSAP.

PAC REFERENCE NUMBER: UBC-447:

1. PAC Investigations: In the first sentence, please change "acceleration" to "accelerated".

PAC REFERENCE NUMBER: UBC-707:

2. PAC Investigations: Please clarify the approximate distance into the ends of waste lines grout was placed. Clarification is needed in the third paragraph of the section.
4. No Further Action Recommendation: Please clarify that the remaining arsenic and benzo(a)pyrene occurrences were not actionable under the Elevated Measurement Comparison protocol of the IABZSAP.



Required Distribution:

M. Aguilar, USEPA  
S. Bell, DOE-RFFO  
J. Berardini, K-H  
B. Birk, DOE-RFFO  
L. Brooks, K-H ESS  
M. Broussard, K-H RISS  
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G. Carnival, K-H RISS  
N. Castaneda, DOE-RFFO  
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S. Gunderson, CDPHE  
M. Keating, K-H RISS  
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